

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

WOPIRB, LLC,

Debtor.

Chapter 11
Case No. 23-12722-pmm

Debtor's First Amended Limited Objection to Motion

Debtor WOPIRB, LLC, through its attorney, objects to the Motion for Relief from the Automatic Stay filed by Stormfield Capital Funding I, LLC, and states as follows:

1. The Motion does not state grounds for relief in support of lifting the *in personum* automatic stay against the Debtor. *See* 11 U.S.C. § 362 (c)(1).

2. If the Court grants the Motion, its order must be stayed for fourteen days, and must not grant relief further than modifying the automatic stay to permit Stormfield to enforce its *in rem* rights under applicable nonbankruptcy law with respect to the property located at 1301-03 West Moyamensing Ave., Philadelphia, PA 19148.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 6, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: 

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Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: May 6, 2024



Mike Assad